

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 9, 2021

BY ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

9/10/2021

Bail is modified as requested. SO
ORDERED.



**Re: United States v. Baudilio Reyes
20 Cr. 507 (PAC)**

Dear Judge Crotty,

I write on behalf of my client Baudilio Reyes with consent from the Government and Pretrial Services (PTS), to respectfully request that the Court **modify the conditions of the bond from so that Mr. Reyes can travel to New Jersey.**

On July 30th, 2020, Magistrate Judge Sarah L. Cave imposed the following bail conditions: \$50,000 PRB; 2 FRP'S; Travel Limited to SDNY/EDNY & ED PA (& Points in Between for Court); Surrender Travel Documents (& No New Applications); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft to Continue or Seek Employment; Deft Not to Possess Firearm/Destructive Device/Other Weapon; Deft to Be Released on Own Signature; Remaining Conditions to Be Met by 9/1/2020.

Mr. Reyes must travel to New Jersey for work, and also because it is where he spends time with his kids. Mr. Reyes works for Lasting Impressions Construction, a remodeling company that does work both in Philadelphia, and in the neighboring counties of New Jersey. Mr. Reyes is often asked to pick up materials from New Jersey for the company's projects. In addition, many of the activities that Mr. Reyes can afford to do with his kids are located in New Jersey. Recreational activities that Mr. Reyes' kids enjoy are simply too expensive in the Philadelphia area. To budget, and cut down on costs, Mr. Reyes takes them to bowling alleys and arcades across the bridge (a 20-minute drive from his residence) in New Jersey. Mr. Reyes has been compliant with the conditions of his bail, and constantly communicates with his PTS officer Tara Sawicki.

Respectfully submitted,
/s/_____
Zawadi Baharanyi
Assistant Federal Defender

cc: Benjamin Schrier (ECF).